

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

Jennifer A. Connors,  
*Plaintiff,*

v.

Dartmouth Hitchcock Medical Center, and  
Mary Hitchcock Memorial Hospital  
*Defendants.*

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Civil Action No. 2:10-cv-00094-wks

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**DEFENDANTS' EXHIBIT LIST**

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Defendants Dartmouth Hitchcock Medical Center and Mary Hitchcock Memorial Hospital, by and through their counsel, Sulloway & Hollis, P.L.L.C., submit the following list of exhibits defendants expect to offer into evidence at the trial of this matter. Defendants reserve the right to amend/supplement this list of exhibits prior to or during trial and to offer any exhibit from plaintiff's exhibit list. However, defendants do not waive any objection regarding the admissibility of any exhibit. Defendants have not listed any exhibits which may be used for purposes of impeachment or rebuttal.

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
A	Graduate Medical Education Red Book, Policy & Procedure Manual for Residents and Fellows 2008-09 (SAME AS PLAINTIFF'S EXHIBIT 5)	X		
B	07/25/05 Letter from Jennifer Connors to Ronald L. Green w/Application for Graduate Training	X		
C	10/27/05 Letter from Ronald Green to Jennifer Connors	X		

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
D	Resident/Fellow Agreement of Appointment for June 26, 2006 through June 25, 2007 CONNORS 000064-66	X		
E	4/20/06 Pre-Placement Health Questionnaire 000144-000150	X		
F	05/27/06 Email from Edward Connors to Brenda Vale re: Hi!! An Update & Some questions from Jennifer 001641-001643	X		
G	06/23/06 NH Board of Medicine Training License Certificate (SS # Redacted)	X		
H	09/10/06 VT Dept. of Health Limited Temporary Physician License Application CONNORS 000856-000869	X		
I	10/16/06 Memorandum from Ronald Green 000683-684	X		
J	12/03/06 Email from Ronald Green to Jennifer Connors 000686	X		
K	12/13/06 Email from Ronald Green to Jennifer Connors 000687	X		
L	12/14/06 Email from Jennifer Connors to Ronald Green 000688	X		
M	12/18/06 Email from Michael Sateia to Jennifer Connors	X		
N	01/08/07 Email from Ronald Green to Jennifer Connors 000689	X		
O	01/30/07 Email from Ronald Green to Jennifer Connors 000690	X		
P	02/07/07 Email from Ronald Green to Jennifer Connors 000691	X		
Q	02/28/07 Re: Block 9 CONNORS 000902-903	X		
R	02/28/07 Summary of Items 000694	X		

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
S	03/02/07 Email from Jonathan Schwartz to Ronald Green 000695	X		
T	03/02/07 Email from Jonathan Schwartz to Bradley V. Watts CONNORS 000904-905	X		
U	03/10/07 Memorandum from Ronald Green CONNORS 000906-907	X		
V	03/21/07 Email from Jennifer Connors to Michael Sateia 001319	X		
W	03/23/07 Memo re: Jennifer Connors 002149-2150	X		
X	04/03/07 Confidential Draft Re: Jennifer Connors, MD 000710-716	X		
Y	04/07/07 Trainee Evaluation, Evaluator Jonathan Schwartz, Block 10 000243-245	X		
Z	04/11/07 Email from Jennifer Connors to Michael Sateia 0001925	X		
A1	04/11/07 Confidential memo from JC to RG, JK, HWP CONNORS 000280-284	X		
A2	04/13/07 Email from Michael Sateia to Ronald Green 001927	X		
A3	04/13/07 Letter from Ron Green to Jennifer Connors CONNORS 000215-216	X		
A4	05/03/07 Letter from Ronald Green to Drs. John McLellan and Carolyn Murray CONNORS 000908-910	X		
A5	07/27/07 Email from Carolyn Murray to Ron Green 001380	X		
A6	07/27/07 Work Fitness Form 001379	X		
A7	09/14/07 Remediation Plan for Dr. Jennifer Connors CONNORS 000911-912	X		

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
A8	Resident/Fellow Agreement of Appointment, September 17, 2007 through January 6, 2008. CONNORS 000059-61	X		
A9	12/21/07 Ronald Green Memo re: Meeting with Dr. Connors CONNORS 000913	X		
A10	12/27/07 Email from Jennifer Connors to Ronald Green 000782	X		
A11	12/31/07 Email from Lisa Lambert to Jennifer Connors 000988	X		
A12	01/01/08 Letter from Ronald Green to Eric Shirley CONNORS 000914-915	X		
A13	01/08/08 Email from Jennifer Connors to Lisa Lambert 001103-001104	X		
A14	Resident/Fellow Agreement of Appointment, January 7, 2008 through January 6, 2009 CONNORS 000056-58	X		
A15	01/21/08 Email from Robert Racusin re: Meeting w/Jennifer Connors 1/21/08 CONNORS/RACUSIN 000009	X		
A16	02/02/08 Trainee Evaluation, Evaluator Lisa Lambert, Block 8 000274-000276	X		
A17	02/27/08 email from Jennifer Connors to Lisa Lambert 000990	X		
A18	03/01/08 Trainee Evaluation, Evaluator Lisa Lambert, Block 9 000277-279	X		
A19	03/06/08 Semi Annual Evaluation from Ronald Green to Jennifer Connors 001962	X		
A20	03/18/08 Email from Lisa Lambert to Jennifer Connors 000993	X		
A21	03/18/08 Email from Jennifer Connors to Lisa Lambert 000994	X		

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
A22	03/20/08 & 03/25/08 Emails between Jennifer Connors and Lisa Lambert 000996-997	X		
A23	03/29/08 Trainee Evaluation, Evaluator Lisa Lambert, Block 10 000286-288	X		
A24	04/26/08 Trainee Evaluation, Evaluator Lisa Lambert, Block 11 000310-312	X		
A25	06/19/06-04/02/08 Analysis of Trainee Comments 000298-301 (Ex. 8 to Deposition of Dr. Beck)	X		
A26				
B1	05/05/08 Note by Jennifer Connors 001006	X		
B2	01/01/08-05/22/08 Analysis of Trainee Comments 000313-317	X		
B3	05/24/08 Trainee Evaluation, Evaluator Lisa Lambert, Block 12 CONNORS 000916-918	X		
B4	06/03/08 Email from Jennifer Connors to James Platt	X		
B5	06/03/08 Note - James Platt (Ex. 2 to Deposition of Platt)	X		
B6	06/06/08 Letter from Jennifer to Dr. Lambert (Ex. 16 to Deposition of Lambert)	X		
B7	06/26/08 Note – James Platt	X		
B8	09/08/08 Note to file- Ronald Green CONNORS 000919-920	X		
B9	09/11/08-10/30/08 Robert Racusin Emails CONNORS/RACUSIN 000001-8	X		
B10	10/24/08 Email from Lanier Summerall to Andrew Pomerantz and Lisa Lambert (Ex. 6 to Deposition of Beck)	X		
B11	10/24/08-12/19/08 – Email Collection (Marked as Exhibit 17 to the Deposition of Lisa	X		

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
	Lambert) 000814-817, 000819, 001029-10300, 00103_, 001034-1036			
B12	Craig Donnelly letter to Robert Racusin 000680-681	X		
B13	11/07/08 Email from Bradley V. Watts to Ronald Green 000975	X		
B14	11/07/08 Email from Lisa Lambert to Ronald Green 000815	X		
B15	11/10/08 Email from Catherine Kutter to Robert Racusin CONNORS/RACUSIN 000016	X		
B16	11/12/08 Email from Ronald Green to Lisa Lambert 000816-B (part of Lambert Deposition Exhibit 17)	X		
B17	11/13/08 Email from Lisa Lambert to Robert Racusin CONNORS/RACUSIN 000021	X		
B18	11/13/08 Racusin Notes CONNORS/RACUSIN 00010	X		
B19	11/17/08 Email from Robert Racusin to Susan and Craig CONNORS/RACUSIN 00011	X		
B20	11/17/08 Email from Ronald Green to Lisa Lambert 000816-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X		
B21	11/17-18/08 Email from Lisa Lambert to Ronald Green CONNORS 000923-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X		
B22	11/17/08 & 11/20/08 Redacted Medical Records (Ex. 8 to the Deposition of Beck)	X		
B23	11/18/08 Email from Ronald Green to Keith Warren CONNORS 000921-B & CONNORS 000922-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X		

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
B24	11/03/08, 11/04/08, 11/07/08 & 11/18/08 Racusin Notes on input from faculty CONNORS/RACUSIN 000012-13	X		
B25	11/19/08 Email from Ronald Green 001972	X		
B26	11/19/08 Email from Ronald L. Green CONNORS 000720-000725 (Redacted 1 <sup>st</sup> paragraph from original production)	X		
C1	11/20/08 Email from E. Lanier Summerall to Ronald Green CONNORS 000924	X		
C2	11/20/08 Email from Lisa Lambert to Ronald Green	X		
C3	11/20/08 Email from E. Lanier Summerall to Ronald Green CONNORS 000926-C & CONNORS 000925-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X		
C4	11/20/08 Email from Jennifer Connors to Robert McLellan CONNORS 000927-B & CONNORS 000926-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X		
C5	11/20/08 Memo from RG CONNORS 000928-929	X		
C6	11/21/08 Email from Lisa Lambert to Ronald Green CONNORS 000927-A (part of Item 12 of RG's submission to Fair Hearing Committee)	X		
C7	10/24/08 – 11/21/08 – Item 12 - Collection of Emails attached to RG's submission to Fair Hearing Committee CONNORS 000921-927	X		
C8	05/01/07, 11/25/08 & 12/04/08 Occupational & Environmental Medicine Notes 001332- 001333	X		
C9	12/08/08 Note – James Platt	X		
C10	12/19/08 Email from Jennifer Connors to Ronald Green 0001036-B & 0001035-A (part	X		

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
	of Lambert Deposition Exhibit 17)			
C11	12/22/08 Email from Jennifer Connors to Lisa Lambert 000979-A (part of Lambert Deposition Exhibit 17)	X		
C12	12/23/08 Email from Lisa Lambert to Ronald Green 0001035-B & 10036-A (part of Lambert Deposition Exhibit 17)	X		
C13	01/02/09 Note to file from Ronald Green CONNORS 000930	X		
C14	01/23/09 Email from Jennifer Connors to Bradley Watts 000985	X		
C15	01/28/09 Letter from Ronald Green to Jennifer Connors CONNORS 000206-210	X		
C16	1998-2009 Connors History (Exhibit 19 to the Deposition of Connors)	X		
C17	02/02/09 Note to file from Ronald Green CONNORS 000934	X		
C18	02/02/09 Notes – James Platt	X		
C19	02/12/09 Letter from Jennifer Connors to Sara H. Koury 001391	X		
C20	01/07/08-02/24/09 Jennifer Connors Milestones	X		
C21	06/11/09 Memorandum from Ron Green to DHMC Fair Hearing Committee Members (w/o attachments) CONNORS 000895-901	X		
C22	06/11/09 Memorandum from Ron Green to DHMC Fair Hearing Committee Members (w/attachments) CONNORS 000895-934	X		
C23	Graduate Medical Education – Fair Hearing Process Confidential Decision 001937-0001940	X		
C24	09/23/09 Letter from Jennifer Connors to University of Texas	X		



EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
C25	09/25/08 Personal Statement – Jennifer Connors to University of Texas Medical School at Houston 002431-002433	X		
C26	10/19/09 Letter from Gifford Medical Center to Jennifer Connors 002589-002595	X		
D1	12/17/09 Jennifer Connors' Application for Physician Licensure VT B.O.M. 46-55	X		
D2	Explanation of Activities to application to Vermont Board of Medical Practice VT B.O.M. 72	X		
D3	Addendum 1, Premedical Education, to application to Vermont Board of Medical Practice VT B.O.M. 75	X		
D4	06/03/10 Email from Jonathan Covault to Jennifer Connors 002620-2621	X		
D5	06/07/10 Fletcher Allen Health Care, Inc. Conditions of Appointment & Training for House Staff 2010-2011 002709-2731	X		
D6	Lebanon College Letter to Jennifer Connors re: new position at Lebanon College 002606	X		
D7	08/14/10 Email from Jonathan Covault to Jennifer Connors	X		
D8	02/25/11 Report of Sheldon Benjamin, M.D.			
D9	CV of Sheldon Benjamin, M.D.	X		
D10	Notes of Sheldon Benjamin, M.D. (Exhibit 3 to the Deposition of Benjamin)	X		
D11	2010 Tax Returns WLF P3250 - P3241	X		
D12	2011 Tax Returns WLF P3258 - P3268, P 3242-3243, P 3282	X		
D13	2012 Tax Returns WLF P3269 – P3278, P3244-3245	X		

EX.	DESCRIPTION	STIPULATED	OFFERED	ADMITTED
D14	2013 Earnings Statements P3279-P3281, P3246, P3248, P3247P3249	X		
D15	Curriculum Vitae – Ronald Green, M.D.			
D16	Curriculum Vitae- William Chandler Torrey, M.D.			
D17	Michele King notes re: Fair Hearing MK 1-4			

Respectfully submitted,

DARTMOUTH HITCHCOCK MEDICAL  
CENTER and MARY HITCHCOCK MEMORIAL  
HOSPITAL

By Their Attorneys,  
SULLOWAY & HOLLIS, P.L.L.C.

DATED: 03/19/14

By /s/ Edward M. Kaplan  
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### **CERTIFICATE OF SERVICE**

I hereby certify that this Exhibit List was served on the following persons on this date and in the manner specified herein: Forwarded via email to: Norman E. Watts, Esq.

DATED: 03/19/14

/s/ Edward M. Kaplan  
Edward M. Kaplan